



DATE : October 11, 1982  
TO : Directors & Staff  
FROM : Joseph Recchi  
SUBJECT : ~~Compliance with~~ Environmental Laws and Regulations

*John*  
Recently City Light received a notice from the Environmental Protection Agency for violations of federal regulations on storage of polychlorinated biphenyls (PCB's). These violations have now been corrected. Also, during the compilation of an inventory of environmental regulations applicable to City Light, it became apparent that we have been in violation of some regulations and unaware of others such as those pertaining to open burning and dumps.

I want to make it clear that it is our policy to conduct our affairs in strict compliance with both the spirit and the letter of environmental regulations. Violations of environmental laws can expose the utility to potentially serious civil liability and, in some cases, to criminal sanctions on individuals as well. We certainly do not need the associated bad publicity that invariably follows. As a public utility with a constituency very sensitive to public health and natural resource issues, our practices should exemplify sensitivity in environmental protection.

The Environmental Affairs Division will continue to provide assistance and interpretation on compliance matters. In addition, I am asking them to conduct periodic compliance audits in an effort to prevent violations of environmental regulations. I have also concurred with Kathy Fletcher's suggestion that an in-house seminar on various pollution and land use regulations would be useful. This seminar will be scheduled far enough in advance that both senior managers and field employees can arrange their schedules to attend.

You should have already received a copy of a document prepared by the Environmental Affairs Division entitled "Inventory of Environmental Laws and Regulations Applicable to Seattle City Light." Please ensure that affected personnel are made aware of these regulations. Some

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revisions to our Emergency Procedures Manual may be necessary to be consistent with the regulations. Environmental Affairs is reviewing the Manual to identify any needed changes. Environmental Affairs will also be responsible for periodic updates of the Inventory.

I expect all City Light employees at all levels to pay careful attention to environmental compliance matters. This is not only a legal obligation for us but a responsibility inherent upon us as public servants.

PM:rps

cc: Macdonald  
Cowan  
Millam  
Tenney  
Dyckman  
EAD (3)  
File

CTY0069616

SEA316029

Ne -

Our Wed. Syst staff presentation is:

"Problems in Environmental Compliance: Plans  
for Employee Education"

Presentation by Phil Millam, Claire Dyckman

Pls tell Mary or Donna.

Thanks

K

## FOR USE ONLY WITHIN SEATTLE CITY LIGHT

TO Joe Recchi  
FROM Kathy Fletcher

SUBJECT Environmental Compliance Session for Directors & Staff  
MESSAGE

Phil Millam is on vacation all week, so to give him a chance to do a "dry run" of our presentation, I'd much prefer to make our presentation to staff mtg on 3/22 rather than 3/15. Sorry I didn't realize his schedule when we discussed yesterday. Is this OK?

REPLY

Thanks,  
KJ

Ponna/Mary - This refers to a 30-40 min. agenda item for Supt staff mtg - I'll give you details when Joe responds to above. Thanks. K

SIGNED

DATE

CTY0069618

Memorandum



Keechi

DATE : October 21, 1982

TO : Joe Keechi

FROM : Katherine Fletcher

SUBJECT: Proposed In-House Seminar on Regulatory Compliance

*Kathy:*  
[redacted] for signing the memo on environmental compliance. We feel that your endorsement of our efforts is a critical step in bringing the utility into full compliance with environmental laws and regulations.

*Kathy:*  
*Thank*  
*for*  
*response/feedback*  
*... the highly*  
*other thought*  
*I have*  
*should we*  
*consider inviting a*  
*few managers*  
*other, of people*  
*from*  
*other departments,*  
*that make*  
*large or meaningful?*  
*Joe*

Your note asked for a few details on the in-house seminar that we propose. Although our own ideas are still in the conceptual stage, we see one day broken down into three main subject areas: policy and roles, pollution regulations, and land use regulation. We have the expertise to handle most of the components, with the possible exception of some of the newer and more complex regulations. In these cases, we will invite the appropriate regulatory agency to participate. Our audience would be mid-to-upper level management. Ideally, we would follow the seminar with a "road show" to bring the message to the operations and field people. This way we can more specifically address the problems faced by, for example, the gardeners of Skagit or the people handling salvage. As for timing, we were thinking of January or February. Our preference would be to conduct the seminar in downtown Seattle, but outside of the City Light Building.

*OK*  
Joe, it would be ideal if you could personally kick off the seminar with a supportive statement. We will check with Donna when we have a better fix on the date.

I hope this answers your questions. Please give me any thoughts you have on making the seminar more effective.

Thank you.

PM:mlr

cc: Macdonald  
Cowan  
Fletcher  
Millam  
EAD (3)  
Terney  
EAD Staff (1)  
File

ENVIRONMENTAL COMPLIANCE

Median	Regulated SCL Activity	Environmental Concern	Applicable Laws/Regulations	Potential Penalties
Air	Centralia Coal Plant	Acid rain, SO <sub>2</sub> , particulate	Federal/State Clean Air Acts	\$10,000/day
	L.U.S.P.	Particulate, opacity	PSAPCA regulations	\$250/day
	*Open burning	Particulate, toxics	State/local regs.	\$250/day
	Auto emissions tampering	Carbon monoxide	Federal Clean Air Act	\$10,000/day
	Fuel storage	Volatile organic compounds	Federal/state/local regulations	\$250/day
	Dust suppression	Particulate	PSAPCA regulations	\$250/day
Water	Oil storage	Oil spills	Federal regulations, State Oil Spill Act	\$5,000-20,000/day
	Construction	Sedimentation, fish	Federal Clean Water Act/Regs. State Act, regs. Shorelines Management Hydraulics Act Fish Protection legislation	\$50-10,000/day
	Sewage treatment	Biochemical, oxygen demand, pH, sludge disposal	Federal Clean Water Act, State laws and regulations	\$5,000-10,000/day
	Drinking water	Disease-causing organisms	Safe Drinking Water Act, State/local regulations	Administrative and civil action only
	Storm drainage	Toxics, safety hazards, "traditional" pollutants	Metro resolution, City of Seattle Ordinance Federal Clean Water Act State laws/regulations	\$50-10,000/violation
Land	Construction activities	Fish, government services, etc.	National Environmental Policy Act State Environmental Policy Act Shorelines Management Corps of Engineers Regs. Fisheries laws	"Stop Work"
	Solid waste disposal	Ground and surface water contamination, toxics, etc.	Resource Recovery Conservation Act State laws/regulations	\$5,000/day
	Toxic waste disposal (PCB's, dumps, pesticides, solvents, etc.)	Birth defects, cancer, mutations, etc.	Toxic Substances Control Act RCRA Superfund Safe Drinking Water Act State Regulations	\$1,000-25,000/day, also criminal
	Herbicide applications in right-of-way	Toxics, misuse, worker safety	EPA State laws/regs	\$10,000/day

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